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VIA ECF

The Honorable Colleen McMahon
United States Courthouse
Southern District of New York
500 Pearl Street
New York, New York 10007-1312

March 16, 2023

Re: Republic of Guatemala v. IC Power Asia Development Ltd.
(Case No. 1:22-cv-00394 (CM))

Dear Judge McMahon:

We write on behalf of the judgment creditor, the Republic of Guatemala (“Guatemala”) in the above-referenced matter. Guatemala has initiated post-judgment discovery in an effort to collect the amount of the judgment issued on December 20, 2022. *See* ECF No. 44. In those efforts, Guatemala has made a request for production to the judgment debtor, IC Power Asia Development Ltd. (“ICPA”), but ICPA has refused to confer or respond on the issue. This is the first discovery dispute that has arisen that Guatemala has been unable to resolve without Court assistance.

In light of the above, and pursuant to your individual practices and procedures section V(B), Guatemala respectfully requests an order of reference to the Magistrate Judge in order to resolve this and any further discovery disputes that may arise during post-judgment discovery.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Quinn Smith'. The signature is stylized with large, sweeping loops.

Quinn Smith

cc. All Counsel of Record (via ECF)
ICPA (via e-mail and mail)